

UNITED STATES OF AMERICA
Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2000)

Docket No. R2000-1

OFFICE OF THE CONSUMER ADVOCATE
MOTION FOR LEAVE TO FILE SUPPLEMENTAL
PREPARED TESTIMONY AND EXHIBITS OF
WITNESS PAMELA A. THOMPSON
(June 12, 2000)

To: Hon. Edward J. Gleiman
Presiding Officer

The Office of the Consumer Advocate ("OCA"), pursuant to Rule 21(a) of the Rules of Practice of the Postal Rate Commission ("Commission"), hereby moves for leave to file supplemental direct testimony and accompanying Exhibits 3A, 3B, and 3C of OCA witness Pamela A. Thompson (OCA-T-9-Supplemental). Concurrently, OCA is filing a Notice of supplemental reference material to be included as part of witness Thompson's library reference LR-I-1 and styled as OCA-LR-I-1 Supplement.

Witness Thompson's supplemental testimony produces the allocation of the test year after rate PESSA costs portion of the OCA cost presentation. She indicated in her direct testimony filed May 22 (OCA-T-9 at 12) this could not be completed due to time constraints and would be filed as a supplement to her testimony. This supplemental testimony also incorporates into the OCA cost proposal the Additional Workday cost effect correction provided by the Postal Service in response to POIR No. 6. Lastly, the

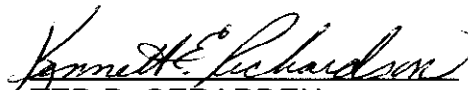
supplemental testimony completes the process begun in Exhibit 2 of witness Thompson's direct testimony (Incorporation of OCA witnesses Smith's and Ewen's Cost Proposals w/o Pessa Costs) by including the OCA's proposed variability changes into the test year after rate PESSA allocations.

The filing of this supplemental testimony will not prejudice any party nor cause any delay in the proceedings and is, in part, necessitated by the corrections filed by the Postal Service to Additional Workday cost effect in response to POIR No. 6 on April 10.

Accordingly, the OCA requests leave to file the attached supplemental testimony and exhibits of witness Thompson (OCA-T-9 Supplemental).

Respectfully submitted,

OFFICE OF THE CONSUMER ADVOCATE



TED P. GERARDEN

Director

Office of the Consumer Advocate

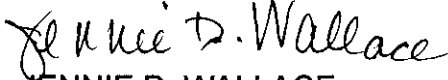
KENNETH E. RICHARDSON

Attorney

1333 H Street, N.W.
Washington, D.C. 20268-0001
(202) 789-6859; Fax (202) 789-6819

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.


JENNIE D. WALLACE

Washington, D.C. 20268-0001
June 12, 2000